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January 31, 2018

VIA ECF

Hon. Sarah Netburn
United States Magistrate Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Centauro Liquid Opportunities Master Fund L.P. v. Bazzoni*,
No. 15 Civ. 9003 (LTS) (SN)

Dear Judge Netburn:

In compliance with the Court's December 7, 2017 order, the parties to the above-captioned action submit this joint letter informing the court of the status of discovery. The parties' respective positions are set forth below:

Plaintiff Centauro Liquid Opportunities Master Fund L.P.: Plaintiff Centauro Liquid Opportunities Master Fund, L.P. ("Centauro") intends to seek documents, interrogatories, requests for admission, and depositions from Defendants CT Energia Ltd. ("CTEL"), CT Energia Ltd. d/b/a Elemento Ltd. ("Elemento"), and Alessandro Bazzoni. Centauro has not yet received the initial disclosures required by Federal Rule of Civil Procedure 26 from Defendant Elemento. Centauro is also in the process of reviewing the documents and declarations submitted by Elemento in support of its motion to dismiss and its opposition to Centauro's motion to amend the order of attachment (ECF Nos. 167, 168, 169, 170, 171, 172, 175 & 176). Elemento's reply in support of its motion to dismiss is due February 1, 2018. To the extent Elemento's reply contains additional documents and declarations or affidavits, Centauro intends to review those in connection with its issuance of discovery requests. Although Centauro has received no Rule 26 disclosures from Elemento, Centauro intends to issue discovery requests shortly, and to meet and confer with defense counsel to narrow its requests, if possible, in light of the documents Elemento has or will provide in connection with existing motion practice. Centauro also intends to confer with defense counsel regarding deposition scheduling. Centauro has received no discovery requests from Defendants since the Amended Complaint was filed.

Defendants Alessandro Bazzoni and CT Energia Ltd.: Alessandro Bazzoni and CT Energia Ltd. ("CTEL") have not received any discovery requests from Plaintiff since the Amended Complaint was filed. Mr. Bazzoni and CTCL currently expect that their discovery requests will consist of narrowly tailored document requests, interrogatories, and a deposition of Centauro's principal, Yvonne Morabito. Mr. Bazzoni and CTCL will serve their discovery requests soon. Mr. Bazzoni and CTCL currently do not foresee a problem completing this discovery by the April 2, 2018 discovery deadline.

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Defendant Elemento Ltd.: Elemento Ltd. (“Elemento”) has not received any discovery requests from Plaintiff. Elemento has received the discovery previously exchanged by the parties and is reviewing it to determine what additional discovery Elemento requires. Elemento currently expects that its discovery requests will consist of narrowly tailored document requests, interrogatories, and a deposition of Centauro’s principal, Yvonne Morabito. Elemento will serve its discovery requests soon. Elemento currently does not foresee a problem completing this discovery by the April 2, 2018 discovery deadline. Elemento will serve its Rule 26 disclosures by Wednesday, February 7, 2018.

Respectfully yours,

/s/Clark A. Freeman

Clark A. Freeman

cc: All counsel of record, via ECF